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Attorneys for Defendant

14 Uber Technologies, Inc.

15  
16 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

17 CAREN EHRET,

18 Plaintiff,

19 v.

20 UBER TECHNOLOGIES, Inc.,

21 Defendant.

Case No. 3:14-cv-00113-EMC

**[PROPOSED] STIPULATION AND  
ORDER**

Judge: Edward M. Chen

Pursuant to the Court's Order of November 26, 2014, Defendant Uber Technologies, Inc. ("Uber") and Plaintiff Caren Ehret ("Plaintiff"), by and through their attorneys of record, stipulate as follows:

1. The deadline for Uber's production of emails and other ESI from additional custodians Travis Kalanick, Ryan Graves and Andrew Macdonald shall be January 23, 2015.
2. The deadline for Plaintiff's filing of a motion for class certification shall be extended to March 12, 2015. The deadline for Uber's filing of its opposition to Plaintiff's motion for class certification shall be extended to April 16, 2015, and the deadline for Plaintiff's reply shall be extended to May 14, 2015.

Uber enters this stipulation without prejudice to Uber's right to object to Judge Ryu's November 26, 2014 order regarding custodians and date ranges and the timeline for production, and reserves its right to file an objection to the order with Judge Chen. Plaintiff reserves her right to oppose such an objection.

DATED: December 9, 2014

By /s/ Stephen A. Swedlow  
 Stephen A. Swedlow  
 Quinn Emanuel Urquhart & Sullivan, LLP  
 Attorney for Uber Technologies, Inc.

DATED: December 9, 2014

By /s/ Hall Adams<sup>1</sup>  
 Hall Adams  
 Law Offices of Hall Adams LLC  
 Attorneys for Plaintiff

<sup>1</sup> I, Stephen A. Swedlow, certify that Hall Adams concurs in the filing of this document.

**ORDER**

GOOD CAUSE APPEARING, the Court hereby approves this Stipulation.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge Edward M. Chen